

**Before the
Federal Communications Commission
Washington, D.C 20554**

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APR 14 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of the Application of

ALLTEL Communications, Inc.

**For Designation as an Eligible Telecommunications
Carrier Pursuant to Section 214(e)(6) of the
Communications Act of 1934**

Docket No. 96-45

FCC 97-419

FCC File No. _____

**APPLICATION OF ALLTEL COMMUNICATIONS, INC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF ALABAMA**

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To: The Chief, Wireline Competition Bureau

**APPLICATION OF ALLTEL COMMUNICATIONS, INC.
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF ALABAMA**

ALLTEL Communications, Inc., on behalf of itself and its wholly-owned and controlled licensee affiliates, ("ALLTEL") and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended, (the "Act"), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier ("ETC") throughout its licensed service area in the State of Alabama. As demonstrated below, ALLTEL meets all the statutory and regulatory prerequisites for ETC designation, and ALLTEL's designation will serve the public interest.

I. ALLTEL's Universal Service Offering

ALLTEL is the licensee authorized to provide cellular mobile radiotelephone service in Alabama Cellular Market Areas 83, 139, 246, 310, 311, 312, 313 and 314. The Company intends to obtain high cost loop support funding in both rural and non-rural areas to speed the delivery of advanced wireless services to the citizens of Alabama. As an ETC, ALLTEL will also offer a basic universal service package to subscribers who are eligible for Lifeline support. ALLTEL's service offerings will be competitive with those of the incumbent LECs.

ALLTEL currently provides all the services and functionalities supported by the federal universal service program (as set forth in Section 54.101(a) of the FCC's rules) throughout its cellular service area

in Alabama. Upon designation as an ETC, ALLTEL will make available to consumers a universal service offering over its cellular network infrastructure, using the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing cellular service customers.

II. ALLTEL Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC.

ALLTEL satisfies each of the elements enumerated by the FCC for ETC designation pursuant to Section 214(e)(6) of the Act and as set forth in the FCC's *Section 214(e)(6) Public Notice*¹.

A. Public Service Commission Has Provided an Affirmative Statement That It Does Not Regulate CMRS Carriers.

As a CMRS carrier, ALLTEL is entitled to seek designation as an ETC². Section 254(e) of Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support." 47 U.S.C. §214(e). Pursuant to 47 U.S.C. §214(e)(6), the Commission may, upon request, designate as an ETC "a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State Commission."

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it "is not subject to the jurisdiction of a state commission."³ In its *Twelfth Report and Order* in this docket, the Commission stated that where a carrier provides the Commission with an "affirmative statement" from the state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation, the Commission would consider requests filed pursuant to 214(e)(6).⁴

On March 12, 2002, the Alabama Commission released an order in Docket U-4400 regarding the Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. ETC Petition. In the order the PSC stated:

¹ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, Public Notice*, 12 FCC Rcd 22947 (1997) ("*Section 214(e)(6) Public Notice*").

² *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order*, 12 FCC Rcd 8776, 8858-59 (1997) Para. 145 ("*First Report and Order*").

³ *Section 214(e)(6) Public Notice*, at 22948.

Given the aforementioned conclusions by the Commission, it seems rather clear that the Commission has no jurisdiction to take action the Application of the Pine Belt companies for ETC status in this jurisdiction. The Pine Belt companies and all other wireless providers seeking ETC status should pursue their ETC designation request with the FCC as provided by 47 USC §214(e)(6).⁵

ALLTEL notes that the Pine Belt order is the basis for the affirmative statement as to the Alabama PUC's lack of jurisdiction over CMRS applications for ETC status referenced by other ETC applicants.⁶ It is now well settled that the Alabama PSC is without authority to take action on ALLTEL's ETC application, and that the Pine Belt order provides the requisite "affirmative statement" from the Alabama PSC in full satisfaction of Section 214(e)(6). Consequently, the FCC is the appropriate regulatory authority to consider ALLTEL's application for ETC status.

B. ALLTEL Offers Each of the Services Supported By the Federal High-Cost Universal Service Program.

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area. 47 U.S.C. §214(e)(1). The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:

1. Voice-grade access to the public switched telephone network;
2. Local Usage;
3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and

⁴ *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas, Twelfth Report and Order, and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 12208, 12264 (2000).

⁵ *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. For ETC Status and/or Clarification Regarding the Jurisdiction of the Commission To Grant ETC Status to Wireless Carrier*, Order, Docket U-4400 (March 12, 2002).

⁶ See, NPCR, INC, d/b/a/ Nextel Partners, *Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama*, filed April 4, 2003.

9. Toll limitation for qualifying low-income consumers.

The *Section 214(e)(6) Public Notice*, requires a carrier to certify that it provides each of the supported services, or where appropriate, its functional equivalent.⁷ As shown below and in the Declaration attached as Exhibit A hereto, ALLTEL currently provides, or will provide upon designation, the required services.

1. Voice-grade access to the public switched network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth and frequency range.⁸ ALLTEL meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with Local Exchange Carriers ("LECs"), all customers of ALLTEL are able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local Usage. ETC's must include local usage beyond providing simple access to the public switched network as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue.⁹ As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, *if any*, local usage should be required to be provided to customers as part of a universal service offering.¹⁰ In the *First Report and Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide.¹¹ Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. ALLTEL will comply with any and all

⁷ *Section 214(e)(6) Public Notice*, at 22948

⁸ *First Report and Order*, at 8810-11.

⁹ See *Federal and State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) ("*October 1998 NPRM*").

¹⁰ *October 1998 NPRM*, at 21277-21281.

¹¹ *First Report and Order*, at 8812. See also, *Western Wireless Corporation*, 16 FCC Rcd 48, 52-53 (2000), *aff'd*, FCC 01-311 (October 19, 2001); *Cellco Partnership*, 16 FCC Rcd 39, 42 (2000).

minimum local usage requirements adopted by the FCC. ALLTEL will meet the local usage requirements by including local usage plans as part of its universal service offering.

3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. §54.101(a)(3). ALLTEL currently uses out-of-band digital signaling and it therefore meets this requirement.

4. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.¹² The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.¹³ ALLTEL meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

5. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E911 includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), but is only required if a public emergency service provider is capable of both receiving and utilizing the data and has made arrangements with carrier for the delivery of the data.¹⁴ ALLTEL currently provides its subscribers with access to emergency services by dialing 911 in accord with this requirement. It either provides, or will provide Phase I (and Phase II) E-911 services in accord with the E-911 deployment schedules agreed to by ALLTEL and the local or other governmental emergency service providers.

6. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone

¹² *First Report and Order*, 12 FCC Rcd at 8810.

¹³ *Id.*

¹⁴ *See Id.*, at 8815-17.

call.¹⁵ ALLTEL meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g. LECs, IXC, etc.)

7. Access to interexchange service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. "The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms."¹⁶ ALLTEL presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

8. Access to directory assistance. The ability to place a call to directory assistance is a required service offering.¹⁷ ALLTEL meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212".

9. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. §54.101(a)(9).¹⁸ In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.¹⁹ ALLTEL currently has no Lifeline customers because only carriers designated as an ETC can participate in the provision of Lifeline service. See 47 C.F.R. §§54-400-415. Once designated as an ETC, ALLTEL will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. The Company currently provides toll-blocking services. Accordingly, ALLTEL currently has the technology to provide toll blocking and will implement this technology to provide the service at no charge to its Lifeline customers as part of its universal service offerings.

¹⁵ *Id.*, at 8817-18.

¹⁶ *Id.*, at 8819.

¹⁷ *Id.*, at 8821.

¹⁸ See *Universal Service Fourth Order on Reconsideration in CC Docket No. 96-45, Report and Order in CC Docket Nos. 96-45, 96-262, 94-1, 91-213, 95-72*, 13 FCC Rcd 5318, 5388 (1997).

¹⁹ *First Report and Order*, at 8821-22.

C. ALLTEL Will Offer Supported Services Through its Own Facilities

The Commission's *Section 214(e)(6) Public Notice* established that a carrier requesting designation must certify that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services."²⁰ ALLTEL will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing cellular service customers. See Exhibit A hereto.

D. ALLTEL Will Advertise its Universal Service Offering.

ALLTEL will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the designated service area of both the services available and the corresponding charges.²¹ ALLTEL currently advertises its wireless services through several different media. ALLTEL will use the same media of general distribution it currently employs for its cellular services to advertise its universal service offerings throughout the service areas designated by the Commission. ALLTEL will comply with all form and content requirements, if any, promulgated by the FCC in the future and required of all designated ETCs.

III. ALLTEL Requests Designation Throughout Its Licensed Service Area in Alabama.

ALLTEL, in its capacity as a provider of cellular services, is not a "rural telephone company" as that term is defined by 47 U.S.C. 153(37). Accordingly, ALLTEL is required to describe the geographic area in which it requests designation.²² ALLTEL requests ETC designation for its entire licensed service area in Alabama as depicted on the map attached hereto as Exhibit B.

Pursuant to Section 54.207 of the Commission's rules, a "service area" is a "geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms." 47 C.F.R. §54.207(a). For non-rural service areas, there are no restrictions on how a state commission defines the "service area" for purposes of designating a competitive ETC. Therefore,

²⁰ *Section 214(e)(6) Public Notice*, at 22949.

²¹ *See Section 214(e)(6) Public Notice*, 12 FCC Red at 22949.

²² *Id.*

the Commission may designate ALLTEL as an ETC in the non-rural wire centers set forth at Exhibit C attached hereto. To the extent ALLTEL serves only a portion of the wire center, ALLTEL requests ETC designation in that portion of the wire center where it provides service.

In an area served by a rural telephone company, the FCC's rules define "service area" to mean the ILEC study area unless a different definition of service area is established for such company.²³ The rural ILEC study areas that ALLTEL serves are listed in Exhibit D attached hereto. The Commission may designate ALLTEL as an ETC in those areas upon finding that such designation would be in the public interest (see Section V below).²⁴

In situations where ALLTEL is not licensed to serve a rural ILEC study area in its entirety, ALLTEL may be designated as an ETC once the FCC redefines the ILEC's service area in accordance with FCC rule section 54.207(c)(1). Where ALLTEL services only a portion of a wire center listed, it requests that it be designated as an ETC in that portion of the wire center in which it provides service.

The Alabama Public Service Commission does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC. Consequently, the FCC has jurisdiction to consider a redefinition of the ILEC service areas in Alabama for ETC purposes, as set forth in Section IV below.

IV. ALLTEL Requests that Affected Rural ILEC Service Areas be Redefined.

Pursuant to 47 C.F.R. §54.207(c)(1), a petition to redefine a rural ILEC service area must contain, "an analysis that takes into account the recommendations of any Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company." ALLTEL requests that the Commission redefine the service areas of ALLTEL Alabama, Inc. (a wireline affiliate of ALLTEL by virtue of common ownership by ALLTEL Corporation), Butler Telephone Company, Inc., Frontier Communications of Lamar County, Frontier Communications of The South, Millry Telephone Company and Pine Belt Telephone Company to exclude the wire centers listed in Exhibit E attached hereto. ALLTEL serves only a portion of the service area of these companies.

²³ See, 47 C.F.R. §54.207(b).

²⁴ 47 U.S.C. §214(e)(2).

Accordingly, the Commission may prefer to define the wire centers that ALLTEL serves as one service area and the wire centers that ALLTEL does not serve as a separate service area. The rural wire centers ALLTEL does not serve are set forth in Exhibit E attached hereto.

The FCC has adopted a plan for disaggregation of rural LEC study areas in its *Fourteenth Report and Order*, noting that such action “achieves a reasonable balance between rural carriers’ needs for flexibility and the Commission’s goal of encouraging competitive entry.”²⁵ In the instant case, reclassifying rural LEC service areas for ETC purposes is necessary in order to facilitate competitive entry.

In the *Recommended Decision* that laid the foundation for the FCC’s *First Report and Order*, the Federal-State Joint Board enumerated three factors to be considered when redefining a rural service area.²⁶ First, the Joint Board advised the state commission to consider whether the competitive carrier is attempting to “cream skim” by only proposing to serve the lowest cost exchanges.²⁷ As a wireless carrier, ALLTEL is restricted to providing service in those areas where it is licensed by the FCC. Rather than picking and choosing the lowest cost exchanges, ALLTEL has based its requested ETC service area solely on the basis of its licensed service area which it proposes to service in its entirety.

Second, the Joint Board urged the Commission to consider the rural carrier’s special status under the Telecommunications Act of 1996.²⁸ In deciding whether to award ETC status to ALLTEL, the Commission will weigh numerous factors and will consider how the public interest is affected by an award of ETC status pursuant to 47 C.F.R. § 214(e)(2). Congress mandated this public interest analysis in order to protect the special status of rural carriers in the same way it established special considerations for rural carriers with regard to interconnection, unbundling, and resale requirements.²⁹ Accordingly, if the Commission finds that ALLTEL’s ETC designation is in the public interest, it has duly recognized the

²⁵ *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order*, FCC 01-157, Docket 96-45, 23 CR 1338 (May 23, 2001) at para. 144 (“*Fourteenth Report and Order*”).

²⁶ *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87 (1996).

²⁷ *Recommended Decision*, 12 FCC Rcd 97, at para. 172.

²⁸ *Id.* at para. 173

²⁹ *Id.* at para. 173

special status of the rural carrier for purposes of determining whether ALLTEL's service area designation should be adopted for federal universal service funding purposes. No action in this proceeding will affect or prejudice any future action this Commission may take with respect to the LEC's status as a rural telephone company.

Finally, the Federal-State Joint Board recommended that the FCC consider the administrative burden a rural LEC may face by calculating its costs on a basis other than its entire study area.³⁰ In the instant case, ALLTEL is proposing to redefine rural LEC service areas solely for ETC designation purposes. Redefining service areas for ETC purposes will in no way impact the way the affected rural LECs calculate their costs, but it is solely to determine the LEC area in which ALLTEL is to be designated as an ETC. LECs may disaggregate their study areas to reallocate high cost loop support payments pursuant to the FCC's *Fourteenth Report and Order*.³¹ Accordingly, redefining rural LEC service areas as proposed herein will not impose any additional burdens on rural LECs.

V. Granting This Application Will Serve the Public Interest.

ALLTEL is seeking designation in areas served by rural LECs. The FCC must therefore consider the public interest factors supporting ALLTEL's application prior to designating ALLTEL as an ETC pursuant to 47 U.S.C. §214(e)(6). Designating ALLTEL as an ETC in Alabama would further the public interest by bringing the benefits of additional competition service offerings to an under served marketplace.

The FCC has recognized the advantages wireless carriers can bring to the universal service program. In particular, the FCC has found that "imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at much lower costs than traditional wireline service."³² One of the principal goals of the Telecommunications Act of 1996 was to "promote competition and reduce regulation in order to secure

³⁰ *Id.* at para. 174

³¹ *Fourteenth Report and Order, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers Federal-State Joint Board on Universal Service, Second Report and Order and Further Notice of Proposed Rulemaking*, 25 CR 1 (November 8, 2001).

³² *First Report and Order*, 12 FCC Rcd. 8776, 8882-8883

lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.”³³ Competition drives down prices and promotes the development of advanced communications as carriers vie for a consumer’s business.

In its decision to designate Western Wireless as an ETC in the State of Wyoming, the FCC observed, “Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”³⁴ Similarly, in designating the cellular carrier Smith Bagley, Inc. as an ETC in Arizona, the state commission found competitive entry to provide additional consumer choice and a potential solution to “health and safety risks associated with geographic isolation.”³⁵ More recently, in designating Guam Cellular and Paging, Inc. as an ETC in the territory of Guam, the Commission found that the designation of Guamcell as an ETC in the area served by the rural telephone company in Guam would serve the public interest “by promoting competition and the provision of new technologies to consumers in high cost and rural areas in Guam.”³⁶

Designating ALLTEL as an ETC will bring to consumers these same benefits of competition, including increased choices, higher quality service, and lower rates. In a competitive market, rural consumers will be able to choose the services that best meet their communications needs. With a choice of service providers, the consumer is able to select a provider based on service quality, service availability, and rates.

The public interest standard under Section 214(e)(2) for designating ETCs in territories served by rural telephone companies emphasizes competition and consumer benefit, not protection of the incumbent. In considering the impact that Western Wireless’ ETC designation would have on rural telephone companies, the Commission noted, “[W]e believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its

³³ Telecommunications Act of 1996, Public Law, 104-104, 100 Stat. 56 (1996).

³⁴ *Western Wireless Corporation*, DA 00-2896 (released December 26, 2000) (“*Wyoming Order*”), 16 FCC Rcd. 48, 55; *aff’d*, FCC 01-311 (released October 19, 2001), at para. 17.

³⁵ *Smith Bagley, Inc., Order*, Decision No. 63269, Docket No. T-02556A-99-0207 (Arizona, December 15, 2001), at p. 12.

³⁶ *Guam Cellular and Paging, Inc.*, DA 02-174, (released January 25, 2002) para. 1.

customers.”³⁷ Further, Congress has mandated that universal service provisions be “competitively neutral” and “necessary to preserve and advance universal service.” See, 47 U.S.C. §253(b). Designating ALLTEL as an ETC would provide consumers in covered rural areas in Alabama another choice for advanced telecommunications services.

ALLTEL will implement a variety of service offerings and rate plans that will be both competitive with incumbent LEC service offerings and affordable to Alabama’s consumers. ALLTEL commits that its local calling area will be at least as large as the incumbent LEC, and ALLTEL believes that in all cases its local calling area will be substantially larger, thereby affording consumers an opportunity to reduce intra-LATA toll charges typically associated with wireline service.

ALLTEL commits to use available federal high cost support for its intended purposes – the construction, maintenance and upgrading of facilities serving the rural areas for which support is intended. ALLTEL can conceive of no business plan for remote rural areas that can support deployment of a wireless network sufficiently robust to compete on a level playing field with incumbent LECs. Indeed, without the high cost program it is doubtful that many rural areas would have wireline telephone service even today. Provision of high cost support to ALLTEL will begin to level the playing field with the incumbent LECs and make available, possibly for the first time, a potential competitor for primary telephone service in remote areas of Alabama.

VI. High Cost Certification

Under Sections 54.313 and 54.314 of the Commission’s rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation (“USAC”) their compliance with Section 254(e) of the Federal Telecommunications Act of 1996. As explained above, the PSC does not exercise jurisdiction over CMRS carriers such as ALLTEL. Therefore, in accordance with Section 54.313(b) and 54.314(b), ALLTEL has submitted its high-cost certification with the FCC and USAC. A copy of this certification is attached hereto as Exhibit F.

³⁷ *Id.* at para. 22.

ALLTEL respectfully requests that the Commission issue a finding that ALLTEL has met the high-cost certification requirement and that ALLTEL is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.³⁸

VII. Anti-Drug Abuse Certification

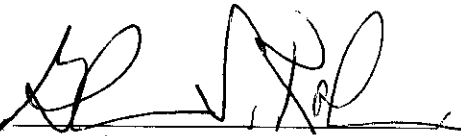
ALLTEL certifies that no party to this petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862. *See* Exhibit G attached hereto.

VIII. Conclusion

ALLTEL respectfully request the Commission to designate it as an ETC on an expedited basis.

Respectfully submitted,

ALLTEL Communications, Inc.

By: 

Glenn S. Rabin
Vice President

Federal Communications Counsel

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Dated: April 14, 2003

³⁸ *See Cellular South License, Inc. Petition for Waiver of FCC Rule Section 54.313*, filed January 9, 2002, *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314*, filed February 6, 2002 at para. 11.

**EXHIBIT A
DECLARATION**

DECLARATION UNDER PENALTY OF PERJURY

I, Glenn S. Rabin, do hereby declare under penalty of perjury as follows:

1. I am an authorized representative of ALLTEL Communications, Inc. ("ALLTEL") with regard to ALLTEL's Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Alabama. This declaration is submitted in support of that Petition.
2. ALLTEL, and its wholly owned and controlled affiliates are the licensees authorized to provide cellular radiotelephone service in Alabama and are authorized to provide service in the requested ETC area described in its Petition.
3. ALLTEL, as a cellular carrier, is not subject to state commission jurisdiction in the State of Alabama and ALLTEL is consequently seeking designation as an ETC pursuant to Section 214(e)(6) of the Act.
4. ALLTEL meets the criteria for ETC designation as demonstrated below.
5. ALLTEL is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. §214(e)(1). A "common carrier" is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission's Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. §20.9(a)(7).
6. ALLTEL currently offers and is able to provide, within its designated service areas, the services and functionalities identified in 47 C.F.R. §54.101(a). Each of these services and functionalities is discussed more fully below.
 - a. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a specified bandwidth. *See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order*, 12 FCC Rcd 8776, 8810-11 (1997) ("*Universal Service Order*"). ALLTEL meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, including BellSouth Telecomm, Inc. ("BellSouth"), all customers of ALLTEL are able to make and receive calls on the public switched telephone network within the specified bandwidth.
 - b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue. *See Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 21252 (1998) ("*October 1998 NPRM*"). As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, *if any*, local usage should be required to be provided to customers as part of a universal service offering. *October 1998 NPRM* at 21277-21281. In the *Universal Service Order*, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide. *Universal Service Order* at 8813. Any minimum local usage requirement established by the FCC as a result of the *October 1998 NPRM* will be applicable to all designated ETCs, not simply wireless service providers. ALLTEL will comply with any and all minimum local usage requirements adopted by the FCC. ALLTEL will meet the local usage requirements by including local usage as part of its universal service offering.

c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. §54.101(a)(3). ALLTEL currently uses out-of-band digital signaling that is functionally equivalent to DTMF signaling. ALLTEL therefore meets the requirement to provide DTMF signaling or its functional equivalent.

d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Universal Service Order* at 8810. ALLTEL meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.

e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E911 includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), but is only required if a public emergency service provider is capable of both receiving and utilizing the data and has made arrangements with carrier for the delivery of the data.³⁹ ALLTEL currently provides its subscribers with access to emergency services by dialing E-911 in accord with this requirement. It either provides, or will provide Phase I (and Phase II) E-911 services in accord with the E-911 deployment schedules agreed to by ALLTEL and the local or other governmental emergency service providers.

f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Universal Service Order*, 8817-18. ALLTEL meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC, etc.).

g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Service Order* at 8819. ALLTEL presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. ALLTEL meets this requirement by providing all of its customers with access to directory assistance by dialing “411” or “555-1212”.

i. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. §54.101(a)(9). See, *Universal Service Fourth Order on Reconsideration*, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *Universal Service Order*, at 8821-22. ALLTEL currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. See 47 C.F.R. §54.400-415. Once designated as an ETC, ALLTEL will participate in Lifeline as required, and will provide toll blocking

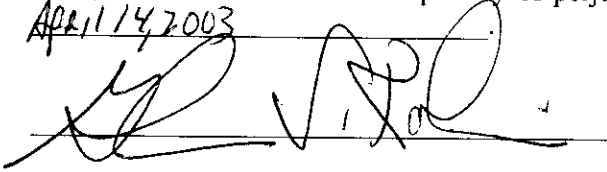
³⁹ See *Id.*, at 8815-17.

capability in satisfaction of the FCC's requirement. Today, the Company provides toll-blocking services. Accordingly, ALLTEL currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.

7. ALLTEL will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing conventional mobile cellular service customers.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on

APR 11 / 4, 2003

A handwritten signature in black ink, appearing to be "V. J. [unclear]", written over a horizontal line.

Its Authorized Representative

EXHIBIT B
MAP OF SERVICE AREA

Alabama

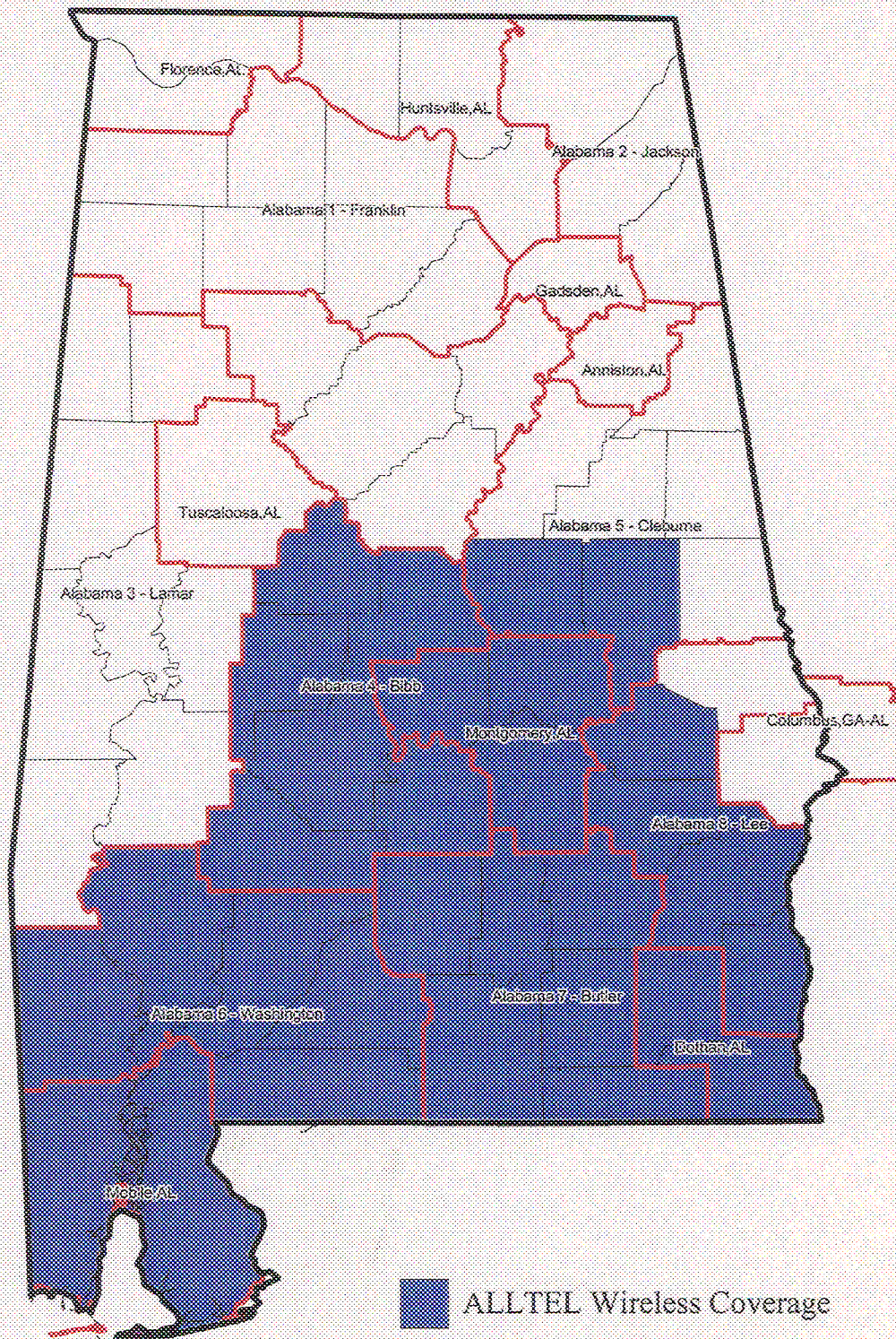


EXHIBIT C
NON – RURAL WIRE CENTERS

Exhibit C

ALLTEL Communications, Inc.			
Non Rural Service Areas Where ALLTEL is Licensed			
Company	County	Wire Center	CLLI
BELLSOUTH TELECOMM INC DBA SOUTH	Autauga County	PRATTVILLE	PRVLALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Baldwin County	BAY MINETTE	BYMNALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Baldwin County	FAIRHOPE	FRHPALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Baldwin County	MOBILE	MOBLALSF
BELLSOUTH TELECOMM INC DBA SOUTH	Barbour County	CLAYTON	CYTNALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Barbour County	EUFAULA	EUFLALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Bibb County	CENTREVILLE	CNVIALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Bibb County	WEST BLOCTON	WBTNALNM
BELLSOUTH TELECOMM INC DBA SOUTH	Chilton County	CLANTON	CLANALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Chilton County	MAPLESVILLE	MPVLALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Clarke County	JACKSON	JCSNALNM
BELLSOUTH TELECOMM INC DBA SOUTH	Clarke County	THOMASVILLE	THVLALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Conecuh County	EVERGREEN	EVRGALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Coosa County	GOODWATER	GDWRALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Dallas County	SELMA	SELMALMT
BELLSOUTH TELECOMM INC DBA SOUTH	Elmore County	HOLTVILLE	HLVIALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Elmore County	MILLBROOK	MTGMALMB
BELLSOUTH TELECOMM INC DBA SOUTH	Elmore County	WETUMPKA	WTMPALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Escambia County	BREWTON	BRTOALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Lowndes County	FT DEPOSIT	FTDPALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Macon County	TUSKEGEE	TSKGALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	CITRONELLE	CTRNALNM
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALSE
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALAZ
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALPR
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALSK
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALAP
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALSH
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALOS
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOBILE	MOBLALSA
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	MOUNT VERNON	MTVRALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	THEODORE	BLFNALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	THEODORE	MOBLALTH
BELLSOUTH TELECOMM INC DBA SOUTH	Mobile County	THEODORE	MOBLALBF
BELLSOUTH TELECOMM INC DBA SOUTH	Montgomery County	MONTGOMERY	MTGMALNO
BELLSOUTH TELECOMM INC DBA SOUTH	Montgomery County	MONTGOMERY	MTGMALMT
BELLSOUTH TELECOMM INC DBA SOUTH	Montgomery County	MONTGOMERY	MTGMALDA
BELLSOUTH TELECOMM INC DBA SOUTH	Perry County	MARION	MARNALNM
BELLSOUTH TELECOMM INC DBA SOUTH	Perry County	UNIONTOWN	UNTWALNM
BELLSOUTH TELECOMM INC DBA SOUTH	Pike County	TROY	TROYALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Tallapoosa County	ALEXANDER CITY	ALCYALMT
BELLSOUTH TELECOMM INC DBA SOUTH	Tallapoosa County	DADEVILLE	DDVLALMA
BELLSOUTH TELECOMM INC DBA SOUTH	Washington County	MC INTOSH	MCINALMA
VERIZON NORTH INC.	Chilton County	JEMISON	JMSNALXA
VERIZON NORTH INC.	Chilton County	THORSBY	THRSALXA
VERIZON NORTH INC.	Clarke County	COFFEEVILLE	CFVLALXA
VERIZON NORTH INC.	Coosa County	ROCKFORD	RCFRALXA
VERIZON NORTH INC.	Dallas County	ORRVILLE	ORVLALXA
VERIZON NORTH INC.	Elmore County	TALLASSEE	TLLSALXA

Exhibit C

ALLTEL Communications, Inc.			
Non Rural Service Areas Where ALLTEL is Licensed			
Company	County	Wire Center	CLLI
VERIZON NORTH INC.	Macon County	NOTASULGA	NTSLALXA
VERIZON NORTH INC.	Mobile County	BAYOU LA BATRE	BLBTALXA
VERIZON NORTH INC.	Mobile County	CODEN	FWRVALXA
VERIZON NORTH INC.	Mobile County	DAUPHIN IS	DPISALXA
VERIZON NORTH INC.	Mobile County	GRAND BAY	GDBAALXA
VERIZON NORTH INC.	Mobile County	IRVINGTON	IRSEALXA
VERIZON NORTH INC.	Wilcox County	ALBERTA	ALBRALXA
VERIZON NORTH INC.	Wilcox County	PINE HILL	PNHLALXA
VERIZON SOUTH INC.-AL	Barbour County	CLIO	CLIOALXA
VERIZON SOUTH INC.-AL	Barbour County	LOUISVILLE	LSVLALXA
VERIZON SOUTH INC.-AL	Butler County	FOREST HOME	FRHMALXA
VERIZON SOUTH INC.-AL	Butler County	GEORGIANA	GRGNALXA
VERIZON SOUTH INC.-AL	Butler County	GREENVILLE	GNVLALXA
VERIZON SOUTH INC.-AL	Butler County	MC KENZIE	MCKNALXA
VERIZON SOUTH INC.-AL	Coffee County	ELBA	ELBAALXA
VERIZON SOUTH INC.-AL	Coffee County	ENTERPRISE	ENTRALXA
VERIZON SOUTH INC.-AL	Coffee County	KINSTON	KSTNALXA
VERIZON SOUTH INC.-AL	Coffee County	NEW BROCKTON	NWBCALXA
VERIZON SOUTH INC.-AL	Covington County	ANDALUSIA	ANDSALXA
VERIZON SOUTH INC.-AL	Covington County	GANTT	GNTTALXA
VERIZON SOUTH INC.-AL	Covington County	OPP	OPP ALXA
VERIZON SOUTH INC.-AL	Covington County	RED LEVEL	RDLVALXA
VERIZON SOUTH INC.-AL	Crenshaw County	BRANTLEY	BTLYALXA
VERIZON SOUTH INC.-AL	Crenshaw County	DOZIER	DOZRALXA
VERIZON SOUTH INC.-AL	Crenshaw County	LIVERNE	LVRNALXA
VERIZON SOUTH INC.-AL	Dale County	ARITON	ARITALXA
VERIZON SOUTH INC.-AL	Dale County	DALEVILLE	DLVLALXA
VERIZON SOUTH INC.-AL	Dale County	DOTHAN	MLCYALXA
VERIZON SOUTH INC.-AL	Dale County	MIDLAND CITY	ECHOALXA
VERIZON SOUTH INC.-AL	Dale County	NEWTON	NWTNALXA
VERIZON SOUTH INC.-AL	Dale County	OZARK	OZRKALXA
VERIZON SOUTH INC.-AL	Geneva County	GENEVA	GENVALXA
VERIZON SOUTH INC.-AL	Geneva County	HARTFORD	HRFRALXA
VERIZON SOUTH INC.-AL	Geneva County	SAMSON	SMSNALXA
VERIZON SOUTH INC.-AL	Geneva County	SLOCOMB	SLCMALXA
VERIZON SOUTH INC.-AL	Henry County	ABBEVILLE	ABVLALXA
VERIZON SOUTH INC.-AL	Henry County	HEADLAND	HDLDALXA
VERIZON SOUTH INC.-AL	Henry County	NEWVILLE	NWVIALXA
VERIZON SOUTH INC.-AL	Houston County	COLUMBIA	CLMAALXA
VERIZON SOUTH INC.-AL	Houston County	DOTHAN	DTHNALXA
VERIZON SOUTH INC.-AL	Houston County	NEWTON	WCBGALXA
VERIZON SOUTH INC.-AL	Pike County	BANKS	BNKSALXA
VERIZON SOUTH INC.-AL	Pike County	BRUNDIDGE	BRNDALXA

EXHIBIT D
RURAL SERVICE AREAS SERVED

ALLTEL Communications, Inc.			
Rural Service Areas Where ALLTEL is Licensed			
Company	COUNTY	Wire Center	CLLI_Code
ALLTEL ALABAMA INC.	Elmore County	ECLECTIC	KWL GALXA
ALLTEL ALABAMA INC.	Elmore County	ECLECTIC	ECL CALXA
ALLTEL ALABAMA INC.	Tallapoosa County	CAMP HILL	CM PHALXA
BUTLER TELEPHONE CO. INC.	Clarke County	GROVE HILL	GVHLALXA
BUTLER TELEPHONE CO. INC.	Pike County	GOSHEN	GSHNALXA
CASTLEBERRY TELEPHONE CO. INC.	Conecuh County	CASTLEBERRY	CSTLALXA
FRONTIER COMMUNICATIONS OF ALABA	Baldwin County	CHRYSLER	CHRYALXA
FRONTIER COMMUNICATIONS OF ALABA	Clarke County	GOSPORT	GSPTALXA
FRONTIER COMMUNICATIONS OF ALABA	Conecuh County	REPTON	RPTNALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	BEATRICE	BTRCALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	FINCHBERG	FNBGALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	FRISCO CITY	FRCYALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	MONROEVILLE	EXCLALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	MONROEVILLE	MOVLALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	PETERMAN	PTMNALXA
FRONTIER COMMUNICATIONS OF ALABA	Monroe County	URIAH	URIHALXA
FRONTIER COMMUNICATIONS OF ALABA	Wilcox County	PINEAPPLE	PNAPALXA
FRONTIER COMMUNICATIONS OF THE S	Escambia County	ATMORE	ATMRALXA
FRONTIER COMMUNICATIONS OF THE S	Escambia County	HUXFORD	HXFRALXA
FRONTIER COMMUNICATIONS OF THE S	Escambia County	MCCULLOUGH	MCCLALXA
FRONTIER COMMUNICATIONS OF THE S	Wilcox County	CAMDEN	CMDNALXA
FRONTIER COMMUNICATIONS OF THE S	Wilcox County	CATHERINE	CTHRALXA
FRONTIER COMMUNICATIONS OF THE S	Wilcox County	VREDENBURGH	VRBGALXA
GRACEBA TOTAL COMMUNICATIONS	Houston County	ASHFORD	ASFRALXA
GRACEBA TOTAL COMMUNICATIONS	Houston County	COTTONWOOD	CTWDALXA
GRACEBA TOTAL COMMUNICATIONS	Houston County	GORDON	GRDNALXA
GTC INC. - AL	Covington County	FLORALA	FLRLALXA
GULF TELEPHONE CO.	Baldwin County	BON SECOUR	BNSCALXA
GULF TELEPHONE CO.	Baldwin County	ELBERTA	ELBTALXA
GULF TELEPHONE CO.	Baldwin County	FOLEY	MGSPALXA
GULF TELEPHONE CO.	Baldwin County	FOLEY	FOLYALXA
GULF TELEPHONE CO.	Baldwin County	FORT MORGAN	FTMRALXA
GULF TELEPHONE CO.	Baldwin County	GULF SHORES	GLSHALXA
GULF TELEPHONE CO.	Baldwin County	GULF SHRS	GLSHALXB
GULF TELEPHONE CO.	Baldwin County	LILLIAN	LLNLALXA
GULF TELEPHONE CO.	Baldwin County	LOXLEY	LXLYALXA
GULF TELEPHONE CO.	Baldwin County	ORANGE BEACH	ORBHALXA
GULF TELEPHONE CO.	Baldwin County	ROBERTSDALE	RBDLALXA
GULF TELEPHONE CO.	Baldwin County	SEMINOLE	SMNLALXA
GULF TELEPHONE CO.	Baldwin County	SUMMERDALE	SRDLALXA
HAYNEVILLE TELEPHONE CO. INC.	Lowndes County	GORDONSVILLE	GOVLALXA
HAYNEVILLE TELEPHONE CO. INC.	Lowndes County	HAYNEVILLE	HYVLALXA
HAYNEVILLE TELEPHONE CO. INC.	Lowndes County	LOWNDESBORO	LWBOALXA
MILLRY TELEPHONE CO.	Washington County	CHATOM	CHTMALXA
MILLRY TELEPHONE CO.	Washington County	FRANKVILLE	FKVLALXA
MILLRY TELEPHONE CO.	Washington County	MILLRY	MLRYALXA
MON - CRE TELEPHONE COOPERATIVE	Crenshaw County	LAPINE	LAPIALXA
MON - CRE TELEPHONE COOPERATIVE	Montgomery County	GRADY	PNLVALXA
MON - CRE TELEPHONE COOPERATIVE	Montgomery County	RAMER	RAMRALXA
PINE BELT TELEPHONE CO. INC.	Wilcox County	ARLINGTON	ARTNALXA
UNION SPRINGS TELEPHONE CO. INC	Bullock County	MIDWAY	MDWYALXA
UNION SPRINGS TELEPHONE CO. INC	Bullock County	PEROTE	PROTALXA
UNION SPRINGS TELEPHONE CO. INC	Bullock County	UN SPGS	UNSPALXA
UNION SPRINGS TELEPHONE CO. INC	Macon County	FORT DAVIS	FTDVALXA

EXHIBIT E
RURAL WIRE CENTERS NOT SERVED

Exhibit E

ALLTEL Communications, Inc.			
Rural Wire Centers Where ALLTEL is NOT Licensed			
Company	County	Wire Center	CLLI Code
ALLTEL ALABAMA INC.	St. Clair County	ASHVILLE	AHVLALXA
ALLTEL ALABAMA INC.	St. Clair County	MOODY	LEDNALXB
ALLTEL ALABAMA INC.	St. Clair County	ODENVILLE	ODVLALXA
ALLTEL ALABAMA INC.	St. Clair County	SPRINGVILLE	SPVLALXA
ALLTEL ALABAMA INC.	Tallapoosa County	CAMP HILL	CMPHALXA
BUTLER TELEPHONE CO. INC.	Choctaw County	BUTLER	BTLRALXA
BUTLER TELEPHONE CO. INC.	Choctaw County	LISMAN	LSMNALXA
BUTLER TELEPHONE CO. INC.	Choctaw County	NEEDHAM	NDHMALXA
BUTLER TELEPHONE CO. INC.	Choctaw County	PENNINGTON	PNTNALXA
FRONTIER COMMUNICATIONS OF LAMAR	Lamar County	KENNEDY	KNDYALXA
FRONTIER COMMUNICATIONS OF LAMAR	Lamar County	MILLPORT	MLPTALXA
FRONTIER COMMUNICATIONS OF THE S	Marengo County	THOMASTON	THMTALXA
MILLRY TELEPHONE CO.	Choctaw County	GILBERTOWN	GLTWALXA
MILLRY TELEPHONE CO.	Choctaw County	SILAS	SILSALXA
PINE BELT TELEPHONE CO. INC.	Marengo County	DIXONS MILLS	DXMLALXA
PINE BELT TELEPHONE CO. INC.	Marengo County	NANAFALIA	NNFLALXA
PINE BELT TELEPHONE CO. INC.	Marengo County	SWEET WATER	SWWRALXA

EXHIBIT F
HIGH COST CERTIFICATION

EXHIBIT F

April 14, 2003

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

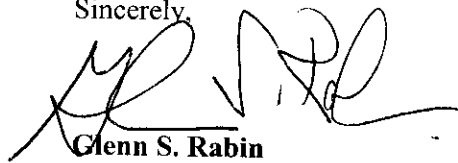
Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

**RE: ALLTEL Communications, Inc.
High Cost Certification
Docket No. 96-45**

Dear Ms. Dortch and Ms. Flannery:

On behalf of ALLTEL Communications, Inc., and in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Alabama, we hereby forward the attached certification for high-cost support under the Universal Service program pursuant to Sections 54.313 and 54.314 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn S. Rabin", is written over the typed name.

**Glenn S. Rabin
Vice President
Federal Communications Counsel**

Enclosure

April 14, 2003

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

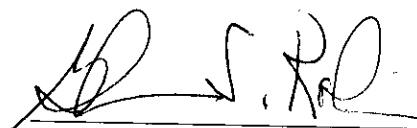
Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

RE: ALLTEL Communications, Inc., Certification or High Cost Loop Support

Dear Ms. Dortch and Ms. Flannery:

This certification is submitted on behalf of ALLTEL Communications, Inc. ("ALLTEL") in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Alabama and in accordance with Sections 54.313 and 54.314 of the Commission's rules. On behalf of ALLTEL, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

ALLTEL Communications, Inc.



Glenn S. Rabin
Vice President
Federal Communications Counsel
Authorized Representative

Date: April 14, 2003

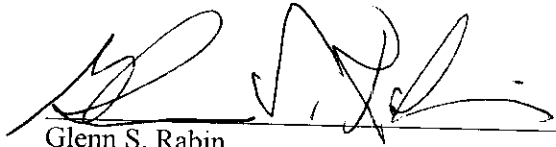
EXHIBIT G
ANTI-DRUG CERTIFICATION

EXHIBIT G

DECLARATION UNDER PENALTY OF PERJURY

I, Glenn S. Rabin do hereby declare under penalty of perjury as follows:

1. I am the Vice President, Federal Communications Counsel for ALLTEL Communications, Inc. ("ALLTEL")
2. To the best of my knowledge, neither ALLTEL nor any of its officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission's rules are subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 U.S.C. § 862.
3. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 14, 2003.



Glenn S. Rabin
Vice President, Federal Communications Counsel
ALLTEL Communications, Inc.

Certificate of Service

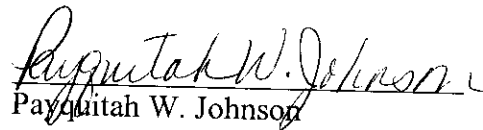
I, Payquith W. Johnson, a secretary with ALLTEL Corporation, do hereby certify that I have on this 14th day of April, 2003 had a copy of the foregoing APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER sent via United State Postal Service to the following:

Ms. Marlene Dortch, Secretary*
Federal Communications Commission
445 12th Street, SW
Washington, DC 20004

Qualex International*
Portals II
445 12th Street, SW
Washington, DC 20554

Ms. Sheryl Todd*
Telecommunications Access Policy Division
Wireline Competition Bureau
445 12th Street, SW
Washington, DC 20554

Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Building
100 North Union Street
Suite 850
Montgomery, Alabama 36101


Payquith W. Johnson

* Via Hand Delivery